



Central Valley Regional Water Quality Control Board

9 October 2013

NOTICE OF VIOLATION

Larry Bright
Valley Water Management Company
7500 Meany Avenue
Bakersfield, CA 93308

CERTIFIED MAIL 7012 2920 0000 1430 3350

INSPECTION REPORT - VALLEY WATER MANAGEMENT COMPANY, RACE TRACK HILL FACILITY, EDISON, KERN COUNTY

Central Valley Regional Water Quality Control Board staff (Staff) inspected the wastewater disposal facility at the Race Track Hill Facility on 18 September 2013. Disposal operations at the facility are regulated by Waste Discharge Requirements Resolution 58-349 (WDRs). Staff's comments and observations are presented in the enclosed inspection report.

Twenty-seven surface impoundments (sumps) were observed on the lease that are used for percolation and evaporation of oil field produced wastewater. The "Entry Sump" has recently been covered with netting to preclude wildlife. The sumps and netting appeared to be in satisfactory condition. Freeboard appeared to be adequate in all of the sumps.

A sprinkler irrigation system is used to irrigate a variety of salt tolerant vegetation to facilitate evapotranspiration of the wastewater. Approximately 94 acres of land on the facility are being irrigated. Sprinklers were operating at the time of the inspection. Waste Discharge Requirements Resolution 58-349 states that wastewater discharged or overflowing onto the surface of the ground needs to conform to the following limits: total dissolved solids cannot exceed 1,000 parts per million (ppm), chlorides cannot exceed 150 ppm, and boron cannot exceed 1.0 ppm.

KARL E. LONGLEY SCD, P.E., CHAIR | PAMELA C. CREEDON P.E., BCEE, EXECUTIVE OFFICER

The wastewater being discharged comes directly from Valley Water Management Company's C-Plant. Analyses of the wastewater at the C-Plant documented the following waste constituent concentrations: electrical conductivity, 5,700 micromhos per centimeter; chloride, 1,800 milligrams per liter (mg/L); and boron, 14 mg/L. The wastewater being sprayed to the ground exceeds the limits permitted by the WDRs. The discharge of wastewater through the sprinkler irrigation system to land is a violation of the WDRs.

Failure to comply with Waste Discharge Requirements Resolution 58-349 can subject you to administrative civil liability (monetary penalties) at a rate up to \$10 for each gallon discharged through the sprinkler system which exceeds the waste constituent limitations contained in Resolved 3.a., b. and c. It is important that you promptly comply with the discharge limitations stipulated in Resolution 58-349 to minimize your potential liability pursuant to California Water Code section 13350(e).

If you have any questions, please contact Ryan West at (559) 445-6188 or by email at Ryan.West@waterboards.ca.gov

DANE S. JOHNSON

Senior Engineering Geologist

PG No. 4239

Enclosure: Inspection Report

cc: Vincent Agusiegbe, CDOG&GR, Bakersfield

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		MEANY AVENUE		\M 1/2 OF 5	SECTION 24, T29		
,		TREET ADDRESS		VV 1/2 01 V	STREET ADDRES		
	BAKER	SFIELD, CA 9330	8		KERN COUN	TY	
CITY, STATE, ZIP CODE				CITY, STATE, ZIP CODE			
LARRY BRIGHT				RUSSELL EMERSON			
DISCHARGER CONTACT PERSON				FACILITY CONTACT PERSON			
(661) 410-7500			wwwater.com	(661) 978-0982 TELEPHONE NO.		erson@vwwater.com E-MAIL ADDRESS	
TELEPHO	ONE NO.						
		GE	NERAL INSPEC	TION INFORMATI	OŅ		
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			INSPECTION	ATTENDEE(S)		•	
	Scott Moore	Cen	tral Valley Water Boa	ard (559) 445-51	170 smo	ore@waterboards.ca.go	
	NAME		COMPANY/AGENCY	TELEPHONE I		E-MAIL ADDRESS	
Ru	issell Emerson	Valley	y Water Management			merson@vwwater.com	
NAME			COMPANY/AGENCY	TELEPHONE I		E-MAIL ADDRESS	
Mike Toland		·	CDOGGR	(661) 334-36		el.toland@conservation.ca.go E-MAIL ADDRESS	
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FACILITIES INSPECTION REPORT
VALLEY WATER MANAGEMENT COMPANY
RACE TRACK HILL FACILITY, EDISON OIL FIELD

	FACILITY INI	FORMATION		
Dil field production wastewater disposal f	facility.		·	Active
ACILITY DESCRIPTION (e.g., total area in acres, number of waste	STATUS (a	STATUS (active, inactive, closed)		
Dil field production wastewater.		Sub-15 Surface Impoundments		
VASTE TYPES	FACILITY	CLASSIFICATION		
wenty-seven unlined surface impoundm		rrigation system.		
ISPOSAL DESCRIPTION (e.g., composting, landfill, surface import	undment, etc.)			
	BACKG	ROUND		
The Race Track Hill Facility (Figure 1) collisposal of wastewater. The wastewater Edison Oil Field, is delivered to the facility. 5 million barrels (189 million gallons) of Edison Oil Field whose wastewater does wastewater contains an electrical conduction.	, collected at Valley y by pipeline for dis f oil field production not meet Basin Pla ctivity of 5,700 micro	Water Management posal. The C-Plant wastewater per year in salinity limits for common per centimet	nt Company's C-Pla Facility accepts appart Facility accepts appart Facility accepts and serving accepts Facility accepts and serving accepts accepts and serving accepts accepts accepts and serving accepts a	nt Facility in the proximately Il oil producers in the d sumps. The
	INSPECTIO	N GIS DATA		
GIS Equipment used:				
MANUFAC	CTURER	MODEL	SERIAL NO.	DATUM
Description of Measured Point	Latitude	Longitude	Datum	Comments
Centroid of Facility	35.392863	-118.821173	NAD 83	
The facility was inspected to observe curphotographs were taken to document of the production wastewater. Wastewater is greently constructed over the "Entry Sun A vacuum truck operator was on-site cleem. Emerson (Valley Water Management of regular facility maintenance. Crude of the sumps did not contain wastew. A sprinkler irrigation system is used to in the wastewater. Approximately 94 acresoperating at the time of the inspection (Family 198).	on the facility that are gravity fed from one one one of the prevent wildlife aning crude oil out out of the company) stated oil was not observed water (Photograph 6 or igate a variety of see of land on the facili Photograph 4).	ge 4). The used for percolate sump to the next in the ferom contacting confidence of the north-east contract vacuum trucks in the remainder of the next vacuum trucks in the remainder of the remainder of the tolerant vegetation of the irrigated (see the use of the next vegetation).	ion and evaporation a downhill series. crude oil in the sump orner of Sump 2 (Pho are used on a frequ f the sumps (Photog on to facilitate evapo e Figure 1). Sprinkl	of oil field Netting was (Photograph 1). otograph 2). ent basis as part raphs 3 and 5). A
	NG INFORMATION			☐ Yes No
Were samples collected during the inspection?	☐ Yes ☒ No ☐ Yes ☒ No	Are sample resu	Its included in report?	
Did discharger collect split samples?			REPLATIONS	
SAMPLE		VINULION WIND OF	CERTATION	
SAMPLE ID	SAMPLE DESCRIPTION/C	DBSERVATIONS	SAMPLE TIN	ME (hours) PHOTO NO
SAMPLE ID	SAMPLE DESCRIPTION/O	DBSERVATIONS	SAMPLE TIM	ME (hours) PHOTO NO
SAMPLE ID	SAMPLE DESCRIPTION/O	DBSERVATIONS	SAMPLE TIM	ME (hours) PHOTO NO
SAMPLE ID	SAMPLE DESCRIPTION/O	OBSERVATIONS	SAMPLE TIM	ME (hours) PHOTO NO

FACILITIES INSPECTION REPORT VALLEY WATER MANAGEMENT COMPANY RACE TRACK HILL FACILITY, EDISON OIL FIELD

DISCUSSION OF SAMPLING RESULTS

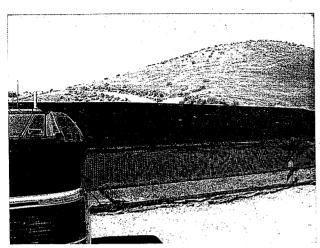
Discuss sampling results (e.g., discuss whether sampling results show compliance with WDRs).

CONCLUSIONS

Summarize the conclusions of the inspection(s) below.

- 1. The "Entry Sump" has recently been covered with netting to preclude wildlife. This resolves the Notice of Violation dated 10 July 2012 issued to Valley Water Management Company.
- 2. A sprinkler irrigation system is used to irrigate a variety of salt tolerant vegetation to facilitate evapotranspiration of the wastewater. Approximately 94 acres of land on the facility are irrigated. Sprinklers were operating at the time of the inspection. Waste Discharge Requirements Resolution 58-349 states that wastewater discharged or overflowing onto the surface of the ground, or into natural drainage channels or into unlined sumps other than those constructed in Section 24, T29S, R29E, MDB&M shall conform to the following criteria: total dissolved solids cannot exceed 1,000 parts per million (ppm), chlorides cannot exceed 150 ppm, and boron cannot exceed 1.0 ppm. Facility wastewater exceeds these criteria.
- 3. The disposal of wastewater through the sprinkler irrigation system is in violation of the WDRs and needs to cease.
- 4. The WDRs are outdated and need to be updated for conformance with current Central Valley Water Board policies, and State regulations and policies.

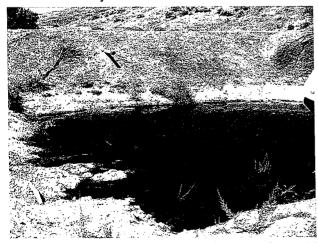
PHOTOGRAPHS



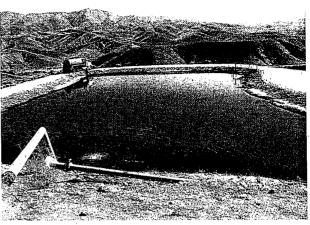
Photograph 1. – View of netting recently constructed over the "Entry Sump."



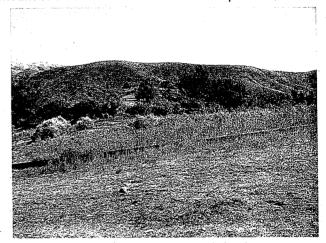
Photograph 3. – View of a few sumps on the northern portion of the facility.



Photograph 5. – View of the elevated berm on Sump 26.



Photograph 2. – View of vacuum truck removing a small amount of crude oil in NE corner of Sump 2.



Photograph 4. – View of a sprinklers irrigating an area on the northern portion of the facility.



Photograph 6. – View of the last sump in the series (Sump 27). Breckenridge road in the background.

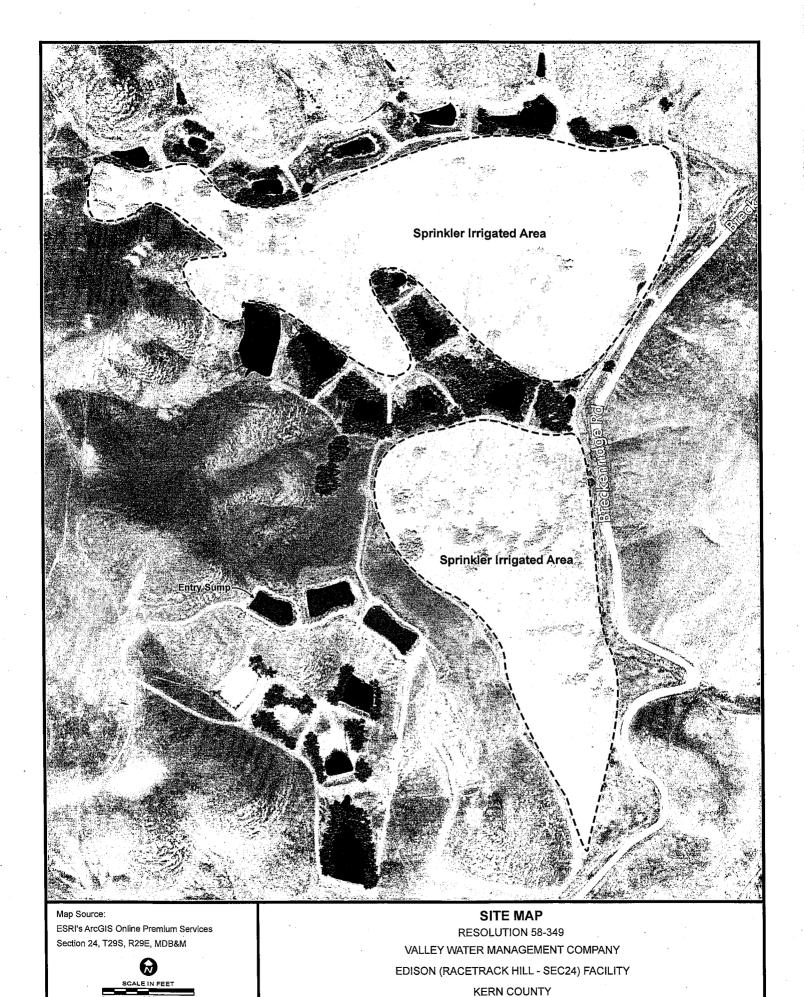


FIGURE 1